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Insurance Company

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

EB HOLDINGS II, INC. and QXH II, INC.,

Plaintiffs,

vs.

ILLINOIS NATIONAL INSURANCE
COMPANY; CONTINENTAL CASUALTY
COMPANY and FEDERAL INSURANCE
COMPANY,

Defendants.

Case No. 2:20-cv-02248-JCM-NJK

**STIPULATION TO EXTEND TIME FOR
DEFENDANT ILLINOIS NATIONAL
INSURANCE COMPANY TO ANSWER
COMPLAINT**

(FIRST REQUEST)

Pursuant to LR-6-1, 6-2 and 7-1 Defendant ILLINOIS NATIONAL INSURANCE COMPANY (“Illinois National”), by and through its counsel Carleton R. Burch of the law firm of Anderson McPharlin & Connors LLP and Plaintiffs EB HOLDINGS II, INC., by and through its counsel Talitha Gray Kozlowski of the law firm of Garman Turner Gordon LLP and QXH II, INC., by and through its counsel Paul C. Fuener of the law firm K&L Gates LLP, have agreed to extend the time for Defendant Illinois National to respond to Plaintiffs’ Complaint to January 15, 2021.¹

This request is for good cause and not for undue delay given:

¹The parties submitted a prior stipulation to extend the time; however, this Court denied the extension, without prejudice, as the prior stipulation did not comport with LR IA 6-1 as it failed to give a reason for the requested extension.

1 1. Plaintiffs Eb Holdings and QXH II filed their Complaint on or about December 11,
2 2020.

3 2. Defendant Illinois National Insurance Company's answer to the Complaint is
4 currently due on or before January 6, 2021.

5 3. Defendant Illinois National Insurance Company seeks an extension to answer the
6 Complaint from January 6, 2021 to January 15, 2021.

7 4. Defendant Illinois National Insurance Company requires additional time to adequately
8 prepare the answer to the Complaint as a result of:

9 (a) Pre-existing professional commitments of its counsel in other matters
10 including, but not limited, to preparing the Respondent's Brief in *Pound for Pound Promotions, Inc.*
11 *v. Golden Boy Promotions, Inc.*, Case A-16-73956, before the Nevada Supreme Court filed on
12 January 4, 2021;

13 (b) Delays resulting from COVID-19 pandemic due to the closing of the legal
14 offices in both California and Nevada as well as client representatives working remotely and in
15 different time zones; and

16 (c) The recent state and federal holidays which has shortened working days to
17 prepare answers in conjunction with the already scheduled vacation time of counsel around the
18 holidays.

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5. There have been no other extensions of time to answer the Complaint in this matter.

IT IS SO STIPULATED:

Dated this 5th day of January 2021.

GARMAN TURNER GORDON LLP

K&L GATES LLP

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ORDER

IT IS SO ORDERED.

Dated: January 7, 2021


United States Magistrate Judge